

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**BERTRUM JEAN, Individually and as  
the surviving father of BOTHAM  
SHEM JEAN, ALLISON A. JEAN,  
Individually and as the § surviving  
mother of BOTHAM SHEM JEAN, and  
ALLISA E. FINDLEY as the §  
Administrator of the Estate of §  
BOTHAM SHEM JEAN, §  
Plaintiffs, §**

**v. §**

**AMBER GUYGER, §  
Defendant. §**

**CIVIL ACTION NO.**

**3:18-CV-2862-M**

**EXHIBIT 1:**

**WITNESS LIST FOR PLAINTIFFS**

<b>Witness Name</b>	<b>Summary of Testimony</b>	<b>Depo sition</b>	<b>Probable/ Possible</b>	<b>Expert/Recor d Custodian</b>
1. Bertrum Jean	Father of Decedent Botham Jean, who will be discussing damages.	N/A	Probable	
2. Allison Jean	Mother of Decedent Botham Jean, who will be discussing damages.	N/A	Probable	
3. Allisa Findley	Sister of Decedent Botham Jean, who will be discussing damages.	N/A	Probable	
4. Jeronimo Rodriguez	Plaintiffs' expert on policing practices.	N/A	Probable	Expert
5. William Harmening	Plaintiffs' expert on policing practices and policies.	N/A	Probable	Expert
6. Michael Maloney	Plaintiffs' expert on scene reconstruction and investigation.	N/A	Probable	Expert
7. Stan V. Smith	Plaintiffs' expert on economics, damages, and income.	N/A	Probable	Expert

8. Robyn Carr Williams	Dallas Police Department Investigator of the scene of the incident who took pictures and processed evidence.	Yes	Probable	Records Custodian
9. Officer Keenan Blair #11183	Dallas Police Department Officer responding to the shooting who provides CPR and moves Mr. Jean, describes training of Dallas Police Officers, and provides his recollection of what he saw when he arrived on scene.	N/A	Probable	
10. Officer Michael Lee #10707	Dallas Police Department Officer responding to the shooting, who provides his recollection of what he saw when he arrived on scene and observations of the conditions.	N/A	Probable	
11. Dr. Todd Patten	Therapist providing support and care to Allisa Findley.	N/A	Probable	Uncontrolled expert.
12. Dr. Chester Gwin	Medical examiner who performed autopsy in this matter and will describe Botham Jean's injuries, as well as the cause and manner of death.	N/A	Probable	Uncontrolled expert.
13. Alyssa Kinsey	Next door neighbor to Botham Jean, who heard the incident occur and provides testimony of what she witnessed during the incident.	N/A	Probable	
14. Paramedic John Fairleigh	City of Dallas Paramedic who provided emergency care to Botham Jean and observed his pain and suffering.	N/A	Probable	
15. Melodi Parker	Counselor providing support and care to Allisa Findley.	N/A	Probable	Uncontrolled expert.
16. Grace Taylor	Counselor providing support and care to Allisa Findley.	N/A	Probable	Uncontrolled expert.
17. Ms. Francisca Plummer BACP	Counselor providing support and care to Allison Jean.	N/A	Probable	Uncontrolled expert.
18. Pastor Samuel L. Berry	Pastor of Botham Jean who will provide damages information about the decedent.	N/A	Probable	

19. Dr. Jennifer Mooney	Treating physician after the incident for Botham Jean at Baylor Hospital.	N/A	Probable	Uncontrolled expert.
20. Tim Ryan	Price Waterhouse Cooper executive who worked with Botham Jean and will testify to his salary, income, and working abilities and skills.	N/A	Probable.	
21. Dispatcher Karla Rivera	Dallas Police Department Dispatcher who received the 911 call by Amber Guyger who can lay foundation for the 911 call and recall her observations of the call.	N/A	Possible/ Designating Deposition.	Record Custodian
22. Det. Eduardo Ibarra	Dallas Police Department Detective called to the scene to investigate. Will describe the investigative steps taken after the shooting.	Yes	Possible/ Designating Deposition.	
23. Julia Wayland	Dallas Police Department crime scene investigator assigned to incident. Lays foundation for crime scene sketch and other documents, responded to investigate the incident as an officer involved shooting.	Yes	Possible/ Designating Deposition.	Record Custodian
24. Amber Guyger	Dallas Police Department Police Officer who discharged her firearm striking Botham Jean. Plaintiffs are likely to present her testimony through her previous statements and criminal trial testimony, on her recollection of the incident.	N/A	Possible/ Interview and Criminal trial Transcript	
25. Lt. Michael J. Mata	Dallas Police Department officer and Union Representative for Amber Guyger after the shooting incident.	Yes	Possible/Designating Deposition.	
26. Officer Tu Minh Nguyen	Dallas Police Department officer who arrived among the first on scene, gave care to Botham Jean, and used towels to stop the bleeding.	Yes	Possible/Designating Deposition	Records Custodian for Body Worn Camera
27. Officer Ryan Barnett	Dallas Police Department officer on scene immediately after the shooting, who canvassed for witnesses and had his Body Worn Camera on.	Yes	Possible/ Designating Deposition.	Records Custodian for Body Worn Camera

28. Sgt. Breanna Valentine	Dallas Police Department Investigator and highest ranking officer for the investigation into the scene of the incident.	Yes	Possible/ Designating Deposition.	
29. Carmen Fletcher	Dallas Police Department Investigator of the scene of the incident who took pictures and processed evidence.	Yes	Possible/ Designating Deposition.	
30. Sgt. Robert Watson	Dallas Police Department officer who arrived on scene and discusses Dallas Police Department General Orders and Training.	N/A	Possible	
31. April Kendrick	Dallas Police Department employee who performed Firearms analysis demonstrating Amber Guyger's firearm worked and matching firearms materials found on scene.	N/A	Possible	Records Custodian for Ex. 10.
32. Officer Stephen Cleary	Dallas Police Department officer who arrived on scene and discusses Dallas Police Department General Orders and Training and his observations on scene.	N/A	Possible	
33. Jacqueline Rodgers	Counselor providing support and care to Allisa Findley.	N/A	Probable	
34. Dr. Scott Kurpiel	Treating physician after the incident for Botham Jean at Baylor Hospital.	N/A	Possible	Uncontrolled expert.
35. Major Chuck Young	Dallas Police Department officer who arrived on scene and discusses Dallas Police Department General Orders and Training and his observations on scene.	N/A	Possible	
36. Erick Jenkins, RN	Treating nurse after the incident for Botham Jean at Baylor Hospital.	N/A	Possible	Uncontrolled expert.